

REMARKS

The Final Action has been reviewed. Claims 24-31 and 39 remain in the application, and these are submitted to define patentable subject matter. Favorable reconsideration, entry of the amendments above and allowance are respectfully urged.

Claims 24-31 and 39 have been rejected under the second paragraph of §112. The rejection is respectfully traversed.

The claim preambles have been amended to obviate this rejection. Applicant is claiming a door module to be fixed on the inner panel of a conventional vehicle door. Applicant makes no claim to the door itself; this is explained in the specification, and is known from the prior art. Basically, a conventional door is understood as that formed by two panels, an "inner panel" and an "outer panel", joined together around their contour to make a hollow casing (called a "*cajón de puerta*" in Spanish and in its English bibliography it is usually called "*door shell*") wherein most of the functional components of the door are mounted.

According to these two panel surfaces which form the main body of the door, they are also mainly structural elements (aside from the fact that they may have other more secondary functions or that the door may also have other structural elements therein).

The panel surface which is conventionally called "inner panel", which faces the inside of the vehicle, always has openings to enable access and mounting of the components which go on the interior of the door.

This inner panel of the door, together with the openings and the actual components, are those which are covered and protected by the interior trim panel, so that in conventional configurations it is necessary to remove said interior trim panel first to be able to access the inside of the door and repair or replace any of those components.

According to this, in the present invention, applicant is claiming a **door module** which is **designed to be mounted on the inner panel of a door**, and this is what should be understood in the preambles of the claims.

However, in the text presented in English, the expression "the door inner liner" has been used to identify the inner panel of the door, instead of "inner door panel", an expression much more in line with that normally used and accepted to relate to the inner panel of a conventional panel door.

The term "liner" is basically used for decorative coverings but not for a structural element. Even when one speaks of interior trim panels on many occasions, the term "liner" is usually used to refer to decorative fabric (the least structural) which is adhered to the exposed surface of an interior trim panel

(also sometimes called "lining"). The present invention relates to a module for the panel.

The matter should now be resolved and clarified by the amendments presented above in the claim preambles. Withdrawal of the rejection is in order and is respectfully requested.

Claims 28-30 and 39 have been rejected under §102 as anticipated by Medebach. This rejection is respectfully traversed.

The solution presented in Medebach is very different, both from the standpoint of the configuration and also from the standpoint of the problem to be resolved, although these last aspects are perhaps not as easy to demonstrate.

With respect to the configuration, it appears that there is some confusion regarding the described concepts and what is shown in the prior art.

With regard to claim 28.

Medebach does not implicitly or explicitly disclose any window opener with L-shaped rails. The rejection gives the impression that the examiner deduces this from the figures, but in the figures one can only see two conventional window opener rails (3 and 4) which are not L-shaped.

Applicant then does not understand what the rejection refers to when it says that there are L-shaped rails in Medebach, unless there is confusion regarding the reinforcements (2), which

in the figures appear represented in a way which gives the suggestion that they form part of the rails.

In any case, what is said to be shown in Medebach has nothing to do with what is claimed. According to the rejection; in Medebach L-shaped window opener rails are described wherefrom various elements project.

This is very different to what is claimed, which are L-shaped appendages of the rails, and which have a very specific function, which is to connect them to the interior trim panel with a certain mobility, which permits and facilitates their subsequent mounting on the door.

Therefore, it is very different to state that the claim recites L-shaped window opener rails from which various elements are projected (what the rejection based on Medebach says), than saying that they are L-shaped appendages that the claimed rails specifically have, and which also have a very specific function which is clearly defined in applicant's claims.

With regard to claim 29.

This claim says that the interior trim panel of applicant's module is constructed to be fastened to the door by screws or rivets, so that they simultaneously join the interior trim panel and the window opener rails to the door.

This is very different from what, according to the rejection, is disclosed in Medebach. According to the rejection, the rails are fixed by "fasteners" although the examiner does not

specify whereto. He does however say that in Medebach, the rails are fastened to the interior trim panel (14), but nothing more.

Indeed, in figures 1 and 2 (there are no more) of this patent, the only thing that is seen are fastenings of the window opener rails (it is deduced from the text that only between the rails and the interior trim panel).

Furthermore, in applicant's embodiments, in the joint between the rails and the interior trim panel, there is no type of additional fastening element that joins them. Neither is there a "fixed" joint between the components, since what is intentionally sought is that the rails are connected to the interior trim panel retaining a certain relative mobility.

Only when the module as a whole is mounted on the door are all the components joined rigidly using additional means.

(This difference is fundamental since it completely changes the door assembly process, and the assembly process is precisely one of the key points in which any modular system intervenes).

With regard to claims 30 and 39.

With regard to this claim, the examiner states that it is anticipated simply because in Medebach it already states that its system incorporates a lock assembly mounted on the same interior trim panel and which protrudes from the perimeter thereof.

This is true, but it should not be forgotten or overlooked that what applicant really claims is the fact that the lock assembly is mounted on the interior trim panel in mobile fashion, so that it can be displaced with respect to the interior trim panel between two positions, one for transport (in which the lock is retracted inside the interior trim panel; this is implicit) and another final assembly and working position wherein the lock assembly is definitively mounted on the door.

This is in fact what is precisely done to resolve the problem created during the assembly by the fact that the lock is located within the door in the position which protrudes from the perimeter covered by the interior trim panel. This is due to the fact that the space and openings available to introduce the lock assembly in the door and mount it thereon are quite limited.

Furthermore, those access openings should finally be covered by the interior trim panel for which reason they cannot go beyond the door perimeter.

Withdrawal of the rejection is in order and is respectfully requested.

Claim 31 has been rejected under §102 as anticipated by Feder. This rejection is respectfully traversed.

With respect to the scope of application and the problem to resolve, Feder indicates that it has the object of a "support plate" which has a series of components therein, designed to cover a large opening on the inner panel of the door

(for the introduction and assembly of the door components) and a structural function as reinforcement of the door.

In no way does Feder state or imply that this support plate is the interior trim panel, but instead it rather says that a part of the interior trim panel is joined thereto as a further component, with the added characteristic that the joint between both is performed by means of a hinge.

This differs from the present invention in the regard that in applicant's door module, and in particular the interior trim panel which supports it, has no structural function. Furthermore, in applicant's solution one of the objectives pursued from the start is to avoid the need for making large openings which increase the typical openings that a conventional door has for the mounting of the components.

The reason why this point is so important is that although larger openings would, on the one hand, facilitate the assembly operation of the module and its components on the door, on the other hand they would affect its structure, weakening it on needing to remove part thereof to leave a space for such openings. For this reason in Feder there is a need for the module support plate to be structural and thus be able to compensate for the loss of structural rigidity that a large opening causes in the door.

With regard to the configuration and the form of
resolving the problem posed.

In Feder the model is constructed on a support plate whereon all the module's components are mounted, among them part of the interior trim panel. As disclosed in this patent, the portion of interior trim panel which is mounted on the module is joined to the support plate by means of a hinge.

The rest of the interior trim panel is mounted in a later operation as a separate and independent component. This support also has a structural function which reinforces the door structure.

In contrast, in applicant's solution, there is no specific part which performs an exclusive support function of the module, since it is the interior trim panel which performs this function (without the aid of other elements). Neither is it necessary to reinforce the door.

On the other hand, although it is true that applicant discloses a hinge-type joint, in applicant's case it is performed between two parts of the interior door trim, enabling an access opening to be opened thereby.

Therefore, in addition to the fact that the hinged joint is different, as it is performed between different pairs of components, its function is also very different.

In the case of Feder, the interior door trim is divided in at least two totally independent parts, so that when the module is mounted on the door there is still at least one

part of the door components accessible as still a part of the interior trim panel is to be mounted.

As a consequence, the hinge disclosed in this patent serves to separate the part of the interior trim panel associated to its module, and in any case, it is not necessary to do this to access all the door components, only for some of them).

In applicant's solution in contrast, the assembly of the module on the door involves that the whole inner panel thereof and the components that are mounted thereon are totally covered by the interior trim panel. In this way, the only form of accessing the components of the interior of the door without again dismantling the module is by removing the part of the interior trim panel which can be separated and which is maintained joined to the rest of it through the hinged joint.

In summary, unlike that disclosed in Feder, the hinge described in applicant's device joins part of the interior trim panel and the remainder thereof and is vital to be able to access the door components without the need to dismantle the module.

Withdrawal of the rejection is in order and is respectfully requested.

Applicant notes that claims 24-27 have not been rejected over any prior art, and are thus deemed by the PTO to be directed to novel and unobvious subject matter.

Appn. No. 09/581,946
Amd. dated August 15, 2007
Reply to Office Action of February 15, 2007

Favorable reconsideration, entry of the amendments above, and allowance are all respectfully urged.

Respectfully submitted,

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